

## **PERMIT ATTACHMENT G PREPAREDNESS AND PREVENTION**

### **Introduction**

The Rinchem Company, Inc. (RCI) is operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at RCI is the protection of the employees and the environment.

### **PREVENTATIVE MEASURES**

The Rinchem Company, Inc. Container Storage Facility (CSF) shall be operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at Rinchem shall be the protection of the employees and the environment.

### **Prevention of Hazards During Unloading**

Unloading hazards shall be reduced through procedures, structural features and equipment used at the CSF. Containerized wastes shall be unloaded and loaded only at the truck dock which is equipped with mechanical dock levelers. All wastes that enter or leave the CSF shall be handled over the sloped and drained concrete of the loading dock. Small trucks shall drive over the berm onto the dock from the east side of the CSF. Longer trucks shall back up to the dock, parking on the sloped and bermed concrete apron to the south. Both areas can contain a 1000-gallon spill.

Rinchem shall maintain hand trucks and safety-rated forklifts specifically designed for hazardous waste container carrying. Containers shall not be lifted more than a few inches above the bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock. In this way, if a container were to be dropped, the distance of the fall would be minimized so that the structural integrity of the container would not be threatened.

### **Prevention of Flooding and Run-Off from Waste Handling Areas**

Flooding of the hazardous waste storage building shall be prevented by the land under the building which is elevated five feet above the surrounding land. This allows any rain that might land near the building to flow away from, instead of towards, the building. Also, the building's roof is sloped and is equipped with a gutter system which allows the rainwater to flow from the CSF in a southwesterly direction into the catchment ponds.

Prevention of runoff from the waste handling areas shall be accomplished in several ways. The storage area for the hazardous waste is situated inside the building over sealed concrete floors

that are sloped and bermed so in the event of a spill or other release the material is contained inside the building. Floors in storage area D of the building are sloped and drained to a waste containment tank located under the dock. All other waste handling areas such as the docks are paved with concrete and built with swails which provide secondary containment.

### **Prevention of Water Supply Contamination**

All the measures discussed in the section above should help to decrease the chance of contamination of water supply. All waste handling shall be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately. Also, the road around the building slopes to the west so that rainwater flows into the drainage ponds in the back of the building. This prevents the mixing of rainwater and any potential contamination from trucks at the dock.

### **Mitigation of Effects of Equipment Failures and/or Power Outage**

Power outages and equipment failures do not create problems in the CSF for the following reasons:

- The storage section of the CSF is lighted only by skylights. The docks are equipped with explosion-proof electrical lighting. The forklifts are equipped with floodlights which allow for their safe use in the dark.
- In an emergency, pull stations shall be operable since the electronic alarm system is battery powered. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.
- Emergency exit signs shall be self-illuminating and visible without electric power.

### **Prevention of Undue Exposure of Personnel to Hazardous Waste**

Training is the key to the prevention of employee exposure. All personnel at the CSF shall be trained in procedures for properly performing CSF operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use and care of personal protective equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the warehouse.

All employees shall be provided with protective equipment which includes, but is not limited to, hard hats, eye protection, steeled-toed boots, respirators, protective overalls and chemically resistant aprons. Employees and visitors shall be required to wear eye protection in the warehouse, on the docks and in the yard at all times. Hard hats shall be worn in the warehouse.

When transferring wastes or cleaning up hazardous waste spills is required, the worker(s) shall wear the appropriate personal protective equipment.

### **Prevention of Releases to the Atmosphere**

In addition to the precautions taken at the CSF to prevent releases, RCI shall implement preventive procedures before the waste is transported to the CSF. Before loading the containers of waste at a generator's CSF, the containers shall be checked for soundness, proper closure and labeling, and compliance with U.S. Department of Transportation (**DOT**) standards. Any damaged containers that might leak or burst during transporting or unloading shall not be accepted for transportation.

In the event of a leak or spill in the combustible storage area, storage area D, the waste shall be drained from the warehouse through the cast-iron pipe that leads to a water tight concrete-lined tank. This 500-gallon concrete tank is housed in a larger water tight concrete tank. Drainage into the tank allows very few vapors to be emitted into the atmosphere.

### **PRECAUTIONS FOR PREVENTION OF ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES**

The CSF has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the *Waste Analysis Plan*, Permit Attachment D.

Containerized waste materials shall be stored only in closed DOT approved containers. These containers shall not be opened unless sampling or repackaging is necessary. Opening of containers shall be strictly prohibited in the storage areas. Sampling and transfer operations are prohibited inside the warehouse building unless there is positive local ventilation to the outside. Generally these operations shall be conducted on the docks.

The storage areas for the containers are inside the building. This allows protection of the waste from extreme heat, cold, and sunlight.

In order to decrease hazards caused by storing incompatible wastes, the building is designed to allow physical separation and secondary containment of incompatible materials. The storage portion of the CSF is separated into six sections by stem walls and cinderblock walls. Each area has sloped floors to contain any material within that area should a spill or leak occur. There are also ramps in between the storage areas to keep any spilled or leaked waste within the storage

area. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a spill or leak quickly and to identify potential problems before they occur.

All storage containers holding hazardous waste that is incompatible with other wastes and materials shall be separated and protected from these wastes and materials by cinderblock walls, stem walls and ramps between the storage areas.

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials shall be stored in designated areas, away from electrical equipment. Second, electrical outlets shall not be located in the areas where these wastes are stored. The rooms are lit by sunlight coming through skylights in the roof and there are no heating systems in the rooms. Third, all wiring and electrical equipment used around the waste storage areas (such as in the temperature control rooms and on the docks) is explosion proof. Rinchem's forklifts are designed and rated to prevent ignition of flammable vapors.

Smoking, and use of matches or lighters shall not be permitted anywhere in the CSF. "NO SMOKING" signs shall be posted at all entrances to the waste storage and handling areas, on CSF perimeter fencing and other prominent places throughout the CSF. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by Rinchem.

### **Required Aisle Space**

The CSF operators shall maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the CSF operation in an emergency.

Each of the seven rooms comprising the CSF shall meet these requirements. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

### **TRAFFIC{tc "TRAFFIC"} [40 CFR 270.14(b)(10)]**

There is only one street approach to the CSF. This entrance is located 600 feet west of Edith Blvd. All the trucks accessing the CSF approach from Edith Blvd. The trucks turn west onto a road and utility easement. This paved road is a private easement that is owned by RCI. The

access road surface is three inches of asphalt over a six inch gravel base course which translates into a load-bearing capacity of fifty 18,000-pound single-axle loads per day over twenty years. The trucks proceed on this easement until they reach the gate of the CSF.

A stop sign and a sign informing the drivers that they must report to the office before proceeding further is at the gate to the loading/unloading dock. After receiving permission from the office, the gate is opened and the driver is escorted to the dock.

After leaving the CSF by way of the easement, the trucks stop at a stop sign that is located at the end of the easement immediately before turning onto Edith Blvd.

The CSF not only receives wastes, it warehouses and distributes chemicals. Tractor/trailers are used to receive chemicals as well as transport wastes. These trailers can be tank, flat or van trailers. The maximum axle weight for any of these rigs is 16,250 pounds and maximum gross weight is 80,000 pounds. Approximately 85 tractor/trailers per month enter and leave the CSF.

Smaller trucks are also used to distribute chemicals to customers and to transport wastes. These trucks vary in weight but generally gross up to 32,000 pounds. Approximately 75 smaller trucks each month enter and leave the CSF.